

Lance A. Maningo
 MANINGO LAW
 Nevada Bar No. 6405
 400 South 4th Street, Suite 650
 Las Vegas, Nevada 89101
 702.626.4646
 lance@maningolaw.com
 Attorney for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

THE UNITED STATES OF AMERICA,)	
)	2:19-cr-00265-RFB-VCF
Plaintiff,)	
)	(Second Request)
vs.)	
)	
DANIELLE ESPARZA,)	
)	
Defendant.)	

Certification: This Stipulation and Order is being timely filed.

STIPULATION TO CONTINUE SENTENCING

IT IS HEREBY STIPULATED AND AGREED, by Defendant DANIELLE ESPARZA, by and through her attorney, LANCE A. MANINGO, ESQ., and the United States of America, by and through KEVIN SCHIFF, Assistant United States Attorney, that the sentencing hearing currently scheduled for January 14, 2021, at 11:00 a.m. be vacated and continued to a date and time convenient for this Court; however, in no event earlier than sixty (60) days from the present date of sentencing.

This Stipulation is entered into for the following reasons:

1. The parties agree to continue the sentencing date for purposes of co-defendant Hurtado still pending plea;
2. That Defendant ESPARZA is in custody and does not object to this continuance;

3. That denial of this request for a continuance could result in a miscarriage of justice; and

4. This is the second request for a continuance of the sentencing date in this case.

RESPECTFULLY SUBMITTED this 6th day of January, 2021.

By: /s/ Lance Maningo
LANCE A. MANINGO, ESQ.
Attorney for Defendant ESPARZA

By: /s/ Kevin Schiff
KEVIN SCHIFF, AUSA
Attorney for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

THE UNITED STATES OF AMERICA,)
) 2:19-cr-00265-RFB-VCF
Plaintiff,)
) (Second Request)
vs.)
)
DANIELLE ESPARZA,)
)
Defendant.)

FINDINGS OF FACTS

Based upon the pending Stipulation of the parties, and good cause appearing therefore,
the Court finds that:

This Stipulation is entered into for the following reasons:

1. The parties agree to continue the sentencing date for purposes of co-defendant Hurtado still pending plea;
2. That Defendant ESPARZA is in custody and does not object to this continuance;
3. That denial of this request for a continuance could result in a miscarriage of justice; and
4. This is the second request for a continuance of the sentencing date in this case.

CONCLUSIONS OF LAW

The ends of justice served by granting said continuance outweigh the best interests of
the public and the defendant, since the failure to grant said continuance would be likely to
result in a miscarriage of justice.

////

////

////

////

ORDER

IT IS THEREFORE ORDERED that sentencing in this matter currently scheduled for January 14, 2021 at 11:00 a.m. be vacated and continued to March 18, 2021 at 9:00 AM in the above-noted Court.

DATED this 11th day of January, 2021.




RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

Respectfully submitted by:

 **MANINGO LAW**
Est. 2002

By: /s/ Lance Maningo
Lance A. Maningo
Nevada Bar No. 6405
400 South 4th Street, Suite 650
Las Vegas, Nevada 89101
Attorney for Defendant ESPARZA

 **MANINGO LAW**
Est. 2002
400 South 4th Street, Suite 650
Las Vegas, Nevada 89101
www.maningolaw.com